

M/037/0088
cc: Tom
Task 3849

TAKE PRIDE
IN AMERICA



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Moab Field Office
82 East Dogwood
Moab, Utah 84532

3809
UTU-74299
(UTY012)

RECEIVED

DEC 13 2010

DIV. OF OIL, GAS & MINING

DEC 10 2010

Mr. Lantz Indergard
Lisbon Valley Mining Company, LLC
755 North Main Street
Moab, Utah 84532

RE: Mine Plan Modification Dump C Expansion/Dump B Reduction

Dear Mr. Indergard:

On December 1, 2010, the Bureau of Land Management (BLM) received Lisbon Valley Mining Company, LLC's "Proposed Mine Plan Amendment. Dump C Expansion/Dump B Reduction". This document is dated November 2, 2010.

We reviewed this mine plan modification per 43 CFR 3809.401 and 43 CFR3809.431(a) and determined that the modification is not complete. For the BLM to finish processing Lisbon Valley's mine plan modification we will need the following information:

Cover Letter:

- Does the document titled "Proposed Mine Plan Amendment Dump C Expansion/Dump B Reduction" dated November 2, 2010 supersede the document with the same title but dated October 29, 2010? This needs to be clarified, as the acreage and tonnage information varies between the two documents. We do not want to assume which document is the modification.
- As described in the third paragraph, first page, last two sentences, "*Expansion of Dump C reduces the waste haul from the southern portion of the planned Centennial pit. This decreases the costly pre-strip phase of the pit expansion.*" Please clarify and quantify how changing expanding Dump C will decrease the costs of the pre-strip phase?
- Provide rationale for expansion of the Centennial Pit, and what is the proposed acreage?
- Provide details regarding the removal and handling of overburden removed for the Centennial pit expansion.

- Have operations ceased in the GTO pit?

Section 1 – Technical Description:

- Provide the length, width and predicted maximum grade of the proposed haul road between Centennial Pit and Dump C and to what standards that road will be constructed.
- Provide the length and width of the haul road between Centennial Pit and Waste Dump B for comparison purposes of haul distance.
- Provide information regarding erosion control and drainage of the proposed haul road. Where will the surface water be directed and contained?
- Provide an estimate of how long it will take to bring Dump C to its proposed expanded capacity?
- Explain how the expansion area will blend in with the existing Waste Dump C? Will the top of the expanded dump area match the grade of the existing dump?
- Will the topsoil on the slope of Dump C be salvaged before expansion begins? If yes, where will it be stockpiled?
- How will the drainage controls for Waste Rock Pile C be expanded to accommodate the proposed expansion?
- In the second paragraph, third sentence of this Section: *“The same amount of waste will be reduced from Waste Dump B, presently in progress.”* The meaning of this statement needs clarification. Though Lisbon Valley has authorization to place waste rock on Waste Dump B, any modifications at Dump B and at Dump C have not been approved.
- Will the same reclamation practices used for the existing Dump C be used for the expanded area?
- Quantify how much of the areal extent of ground disturbance will be reduced by this proposal? It appears that the acreage is only shifting from one place to another.
- Per the Record of Decision for the mine, it says that all waste rock types will be tested and characterized during mining, and as-built waste dump maps will be prepared and maintained during the life of the mine for each waste dump. Would you provide a copy of as-built maps of each waste rock pile, showing where within the dumps the waste rock with acid generating potential is encapsulated within the waste rock that has an acid neutralizing potential.

Thank you for taking the time to respond to our request for more information. If you have any questions, please contact Becky Doolittle at (435) 259-2141.

Sincerely,

/s/ Jeffrey R. Smith

Jeffrey R. Smith
Field Manager

cc. Tom Munson, UDOGM